

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NATIONAL RIFLE ASSOCIATION OF
AMERICA, INC., SECOND AMENDMENT
FOUNDATION, INC., ADRIAN J.
COOMBES, ROELOF KROES, PHILIP
GRADY,

Plaintiffs

v.

STATE OF WASHINGTON, LIZ LUCE,
DIRECTOR, DEPARTMENT OF LICENSING
and PAUL D. AYERS, CHIEF OF POLICE
ISSAQUAH POLICE DEPARTMENT,

Defendants.

No. C08-1613RSM

PLAINTIFFS' INITIAL DISCLOSURES

1. **Individuals likely to have disclosable information:**

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PLAINTIFFS' INITIAL DISCLOSURES (C08-1613)– Page 1

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3 Everett, WA
4 937 209 9583

5 Roelof Kroes
6 4208 255TH PL SE
7 Issaquah, WA 98029
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9 Alan M. Gottlieb,
10 Second Amendment Foundation
11 12500 N.E. 10th Place
12 Bellevue, WA 98005
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14 Corporate designee
15 National Rifle Association

16 Paul D. Ayers, Issaquah Police Chief
17 Issaquah Police Department
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21 Pat Brown, Administrator for Firearms Unit,
22 Department of Licensing
23 PO Box 9020
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Bruce Tanaka,
Firearms Program Manager,
Department of Licensing
PO Box 9020
Olympia, Washington 98504
360-664-6622

Liz Luce,
Director,
Department of Licensing
PO Box 9020
Olympia, WA 98504

2. **Documents that may be used to support claims.** Plaintiffs do not anticipate that many documents, if any, will be required. Possible documents would include communications between the plaintiffs and representatives of the Washington State Department of Licensing; and public statements or web site pages containing statements by the Department of Licensing regarding the issuance of alien firearms licenses.

3. **Computation of damages.** The plaintiffs do not seek an award of damages.

4. **Insurance Agreements.** Plaintiffs do not have any insurance policies relevant to their claims or this case.

Dated: January 21, 2009

s/ Carl J. Carlson

Carl J. Carlson, WSBA #7157

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Certificate of Service

I certify that on January 21, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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